

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Danielle Yvette Davies,
Debtor

Danielle Yvette Davies,
Movant

vs.

Discover Bank,
Respondent

Chapter 7

Case No. 5:23-bk-1194-MJC

DEBTOR'S MOTION TO AVOID LIEN OF DISCOVER BANK

1. Debtor, Danielle Davies, commenced this case on May 30, 2023, by filing the above-numbered voluntary petition for relief under Chapter 7 of Title 11 of the United States Code.
2. This motion is filed pursuant to 11 U.S.C. § 522(f) to avoid and cancel a judicial lien on real property used as the Debtor's residence.
3. On or about July 5, 2022, Respondent obtained a judicial lien on the real property used as Debtor's residence at 419 May St., Mayfield, PA 18433 ("the Residence"). The judgment was entered in Lackawanna County at Docket Number 2022-cv-1136 in the amount of \$16,431.46.
4. Debtor's interest in the Residence has been claimed as fully exempt in the bankruptcy case.
5. The existence of the lien of Respondent on Debtor's property would impair exemptions to which the Debtor would be entitled under 11 U.S.C. § 522(b).
6. Respondent's lien does not secure a debt for a domestic support obligation.

WHEREFORE, Debtor respectfully requests an Order canceling Respondent's lien, and for such additional or alternative relief as may be just and proper.

s/ Brett M. Freeman

Brett M. Freeman

Bar Number PA 308834

FREEMAN LAW

Attorney for Debtor/Movant

210 Montage Mountain Road

Moosic, PA 18507

P: (570) 589-0010

F: (570) 456-5955

brett@freeman.law